

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON**

UNITED STATES OF AMERICA

v.

JASON KELLY INMAN

:
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:
:
:

Case No. _____

Violations: 18 U.S.C. §§ 2251(a) and (e)

INFORMATION

COUNT ONE

The United States Attorney charges that:

1. In or about June 2020 through January 2021, JASON KELLY INMAN, in the Western District of Virginia and elsewhere, persuaded, induced, enticed, and coerced and attempted to persuade, induce, entice, and coerce minors to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct knowing and having reason to know that such visual depiction (a) would be transported and transmitted using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce; (b) was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, and (c) had actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Sections 2251(a) and 2251(c).

NOTICE OF FORFEITURE

1. Upon conviction of the felony offense alleged in this Information, the defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film,

videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1);

- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2);
- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **Electronic Equipment**

One iPhone 11 Plus Promax Cellular Telephone (Model # MWF9211/A)
One Black Samsung Cellular Telephone
One Black and Red SanDisk Electronic Storage Device
One iPhone XR Cellular Telephone (Model # MRYU2LL/A)
One iPhone 7 Plus Cellular Telephone (Model # MNR52LL/A)
One Silver and Black ZEBRA Cellular Telephone (Barcode #AQ-58454)
One iPhone (Model # A2111) with Serial Number DNPZ78C8N72J

- b. All such material containing the above-described visual depictions.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

ENTERED, this _____ day of April, 2021.

Daniel P. Bubar by L.B.
DANIEL P. BUBAR
Acting United States Attorney